

THE HONORABLE NATHANAEL COUSINS

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KLAMATH-SISKIYOU WILDLANDS
CENTER, *ET AL.*,

Plaintiffs,

v.

NOAA NMFS, *ET AL.*,

Defendants,

and

) Case No. 3:13-cv-3717-NC

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)

) **DECLARATION OF JORDAN**

) **BECKETT IN SUPPORT OF**

) **PLAINTIFFS' MOTION FOR**

) **SUMMARY JUDGMENT**

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1)
2 FRUIT GROWERS SUPPLY COMPANY,)
3)
4 Defendant-Intervenor.)
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1 I, JORDAN BECKETT, declare and state as follows:

2 1. As an avid hiker, I have spent considerable time exploring and enjoying the mature forests
3 of southern Oregon and northern California, which has in turn influenced much of my personal
4 and professional life. I have been a member of the Klamath-Siskiyou Wildlands Center (“KS
5 Wild”) since 2010. I reside in Ashland Oregon, largely due to the quality of hiking and
6 mountaineering opportunities that exist in the Klamath-Siskiyou bioregion of northern California
7 and southern Oregon. Over the years I’ve found that I have significantly higher quality
8 recreational experiences in areas where there is less ecological degradation, and therefore both
9 the preservation of mature forests and late-successional species associated with those forests are
10 of utmost importance to me.
11

12 2. I am interested in and support KS Wild’s work to protect the forests and wildlife of the
13 Klamath-Siskiyou region for their botanical, recreational, scientific, hydrological, and aesthetic
14 values. In 2010, I worked as a law clerk for KS Wild, and in 2009 I worked for the Eugene-based
15 nonprofit Cascadia Wildlands. To date, I regularly work and volunteer for KS Wild, Cascadia
16 Wildlands, and Oregon Wild in their efforts to protect and preserve the remaining mature forests
17 in the Klamath-Siskiyou region.
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19 3. I often hike, camp, photograph, and explore the native mature forests of southern Oregon
20 and northern California. I often explore these native forests in order to have the opportunity to
21 observe wildlife in their native habitats, including but not limited to wild Coho salmon, Pacific
22 fishers, and northern spotted owls. I have definite plans to spend considerable time in the future
23 using and enjoying these native forests, including the Klamath National Forest lands in and
24 around the Fruit Grower’s Supply (FGS) Management Units. I have visited and continue to visit
25 these native forests to appreciate the natural beauty and native biodiversity that are unique to
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1 intact undisturbed forests. I am particularly fond of the recreational and ecological values
2 provided by the remaining intact native and mature forests in these watersheds due to their rarity
3 in the Klamath National Forest checkerboard management units, as well as for their importance
4 for wildlife migration and connectivity.

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6 4. I derive significant satisfaction and happiness from the existence of intact forests that
7 provide much-needed habitat for late-successional forest associated wildlife species. My interest
8 in intact forests and the species that rely on those forests for habitat would be directly harmed
9 should the late-successional and mature trees targeted for logging be removed from the forest
10 ecosystem over the next 50 years. Over the next fifty years I will spend a significant amount of
11 my life recreating in these mature forests, and the Habitat Conservation Plan (“HCP”) and
12 Incidental Take Permit (“ITP”) greatly reduces my likelihood of viewing Northern Spotted Owls
13 and Pacific fishers in their native habitat.

14
15 5. In 2008, I hiked from Mexico to Washington on the Pacific Crest National Scenic Trail
16 (“PCT”), which begins at the U.S./Mexico Border and ends at the U.S. Canada border. I hiked
17 through a number of designated Wilderness Areas, National Parks, National Forests, Bureau of
18 Land Management lands, and private agriculture and forest lands where easements provide
19 backcountry access for PCT hikers. From 2008 to present, I have hiked and will continue to hike
20 PCT sections located in California, Oregon, and Washington.

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22 6. The PCT is divided up into alphabetically numbered sections starting at the Mexican
23 border, and California contains sections A through R. PCT section P begins at Castle Crags, CA
24 and ends at Etna Summit, CA, section Q begins at Etna Summit and ends at Seiad Valley, CA
25 and section R begins at Seiad Valley and ends at Ashland, OR. The PCT sections P, Q, and R are
26 220 miles total, take approximately one week to backpack through, and either travel through or
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1 are adjacent to the FGS Klamath River Management Unit and Scott Valley Management Unit as
2 shown on FGS HCP Figure 4-1. I have hiked and will continue to hike this stretch of the PCT,
3 PCT sections P, Q, and R, throughout my lifetime.

4
5 7. The FGS HCP, and the removal of both late-successional forest species and mature forests
6 will significantly impact these PCT sections and will lessen the recreational experiences for
7 myself as well as hundreds of other PCT hikers who traverse these PCT sections every year.

8 8. The PCT is unique in that the trail route “crests” upon achieving a certain elevation level,
9 and consistently remains at high elevations. From these high elevations on the PCT, I saw many
10 miles of landscape and topographical features including native and mature forests, and indeed
11 this is where I derive extensive aesthetic enjoyment and pleasure while hiking the PCT. Both the
12 FGS Klamath River Management Unit and Scott Valley Management Units are readily visible in
13 the viewshed during a majority of the 220 miles I travelled on these sections of the PCT.
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15 9. For instance, the PCT starts in Seiad Valley at an elevation of approximately 1300 feet,
16 rising to 6000 feet along the Lower, Middle, and Upper Devils Peaks. From such an elevation, I
17 derive significant recreational and aesthetic pleasure being able to view intact, native forests
18 from such an expansive vantage point. Significant portions of the Klamath National Forest, FGS
19 lands, and surrounding private lands have already been logged or removed from the viewshed,
20 and seeing the logging and removal of mature forests and associated species harms both my
21 personal aesthetic and recreational interests.
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23 10. A reason I began hiking and will continue to backpack along the PCT is to obtain an
24 uninterrupted wilderness experience. I derive significant personal, recreational, spiritual, and
25 aesthetic benefit being able to hike through such a wide variety of North American ecosystems
26 on a single continuous trail. Intact ecosystems are far more interesting and enjoyable than an
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ecosystem heavily degraded and damaged by logging.

11. I have spent several days hiking the PCT through northern California's Russian Wilderness and Marble Mountain Wilderness, and it is extremely jarring, unpleasant, and depressing to subsequently travel through or along heavily logged lands such as FGS matrix forest lands. Such lands provide little aesthetic or recreational pleasure, provide very little opportunity to view mature forest wildlife such as Northern Spotted Owls, and devalue my recreational experience and satisfaction that comes from spending days and months backpacking on the Pacific Crest Trail.

12. The authorization of the FGS HCP/ITP by the U.S. Fish & Wildlife Service and National Marine Fisheries Service, and its subsequent implementation will prevent me and other members of KS Wild from using and enjoying the area in the future. I would be significantly harmed over the next 50 years when native, mature forests and late-successional forest species are removed from the forest ecosystem, and the landscape and viewshed is further degraded by extensive logging. I am very unlikely to enjoy using an area that has been heavily logged and degraded as is proposed in the FGS HCP/ITP. The members of KS Wild share these views as well. The relief requested by the Plaintiffs would cure the injuries that I have suffered, and would prevent future injuries to my interests in the affected lands.

13. A recent trip to enjoy the recreational, aesthetic, biological, botanical, hydrologic, and scientific features of the checkerboard management units of the Klamath National Forest near FGS lands, and the proposed FGS HCP/ITP location(s), occurred in July of 2013 while hiking along section R of the PCT. In recreational capacity I have visited areas in and around these PCT sections, or lands surrounding these PCT sections, at least 15 times since 2008. I have definite plans to return to these PCT sections during the fall of 2014 for the purposes of enjoying the

1 recreational, aesthetic, biological, botanical, hydrologic, and scientific features of these lands.
2 During this trip, I look forward to observing and enjoying wild Coho salmon and northern
3 spotted owls in their native habitats.

4 14. In 2010, I climbed to the summit of Mt. Shasta, and have definite plans to hike around and
5 summit Mt. Shasta via a different route prior to 2016. The FGS Grass Lake Management unit is
6 clearly visible from the slopes and forests around Mt. Shasta, and logging those forests will
7 decrease the likelihood that I will ever see late-successional forest species such as a Northern
8 Spotted Owl or Pacific fisher while hiking and mountaineering on or around Mt. Shasta.

9 15. I have certain and definite plans to continue visiting the aforementioned PCT sections and
10 the stands proposed for logging throughout my lifetime. Prior to 2015, I have definite plans to
11 hike along the PCT and in the mature forests around Seiad Valley. These mature forests and
12 locations that I regularly recreate in are in close proximity to FGS proposed logging units, and
13 implementation of the HCP will involve significant logging impacts in those areas. The location
14 is very convenient to me and I am fond of the PCT, the surrounding forest stands, trees, trails,
15 and ecosystems located within the Klamath National Forest so that I can observe natural
16 successional processes over time and enjoy a long-term relationship with mature forest lands and
17 the ecological and recreational values that they provide.
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22 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
23 and correct.

24 Date: 7-28-14

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Jordan Beckett